

Appendix E- Public Responsiveness Summary

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Introduction

The purpose of this document is to provide readers with a summary of the public comments that were received during the Public Comment Period for the Camel's Hump Management Unit (CHMU) Long Range Management Plan. The draft plan was released on October 25, 2017 and the comment period was open through January 15, 2018. The comment period was reopened and extended from March 2, 2018 to April 13, 2018. More than 700 comments were received via mail, email, and in comment boxes at the four public meetings held in November and December of 2017.

Public Comments were received, reviewed, and summarized by the Essex District Stewardship Team (DST). The DST is an inter-disciplinary group of natural resource professionals from the Department of Forests, Parks & Recreation, Fish and Wildlife Department, and Department of Environmental Conservation. The DST is responsible for planning and management of ANR lands in the District. When necessary, this group seeks input from other ANR professionals. The DST summarized these comments to capture the sentiment of respondents, though most commenters will not see *their exact* words below. This document organizes comments by theme and includes a response from the Agency of Natural Resources (ANR). Where edits were made to the plan in response to comments, this is clearly stated.

Recreation Management

Mountain Biking

Public Comment theme: Consider additional mountain bike trail opportunities, including trails in Honey Hollow, Stevens Block, a connection from the Mad River Valley to the Huntington River Valley, and the newly planned Velomont Trail.

Response to comments: The plan has been edited to allow consideration of the Velomont trail to traverse the CHMU in the vicinity of the existing Vermont Association of Snow Travelers (VAST) trail in Duxbury using portions of Land Management Classification (LMC) 2.5J and 3.0A (see map 16). The presence of a new hut or new trail would not alter other plans for these areas, including timber harvesting. The trail will not be sited on the northeast "arm" that lies east of Camel's Hump Road and west of Crossett Hill Road.

Mountain biking is allowed on all gravel-surfaced roads on the Department of Forests, Parks and Recreation (FPR) land, in accordance with *FPR Policy #4 Mountain Bicycles, Horseback Riding, and Pack Animals*. This includes gravel roads within Stevens Block of Camel's Hump State Forest, and Honey Hollow in Camel's Hump State Park.

ANR is not supportive of the other suggested expansion opportunities.

- The lower elevations of Stevens Block are managed specifically with wildlife in mind, and the area above this would be severely limited by terrain and size.

- ANR considers the availability of recreation resources in the local community when considering new trail networks on state land. There are mountain biking opportunities near to Honey Hollow in Richmond and Waterbury, on both public and private land.
- A mountain bike trail linking the Mad River Valley and Huntington River valleys on state land would likely need to cross the Huntington Gap WMA. Such a trail would not be in line with the primary goals of the WMA.

Public Comment theme: Additional mountain bike trails are not necessary. These trails will lead to the development of dense networks and pose a serious risk to wildlife. Trails may also lead to erosion.

Response to comments: Additional mountain bike trails are proposed in the plan and focus on connectivity between, and enhancements to, existing trail networks, not the establishment of new trail networks. The plan has been edited to consider locating the Velomont Trail in LMC 2.5J and 3.0A (see map 16). The Velomont trail would be in the vicinity of an existing VAST trail and thus the area of new impact would be limited. The possibility of mountain bike trail expansion in Phen Basin remains in the plan.

The DST recognizes improper trail location, design, or use can impact wildlife or create erosion. The DST thoroughly reviews the routes of new trails and considers the impact to important habitat features, water, and forest health. Mountain bike trails on state land are installed and maintained by experienced volunteers, professional trail crews, and FPR staff using International Mountain Bicycling Association sustainable trail standards designed to minimize erosion.

Public Comment theme: Mountain bikers have a deservedly bad reputation. They ignore signage on state land, cut illegal trails on private land, and disrupt hunting seasons.

Response to comments: ANR works closely with the Vermont Mountain Bike Association (VMBA) and local chapter volunteers to educate riders about the importance of observing signage and working with landowners to enhance riding opportunities. A cooperative agreement between VMBA and ANR specifies that all mountain bike trails on state land are closed for use from November 1 to Memorial Day weekend each year, unless unusually dry conditions allow the DST to open trails earlier in the spring. This closure spans popular hunting seasons and spring mud season. Winter fat bikes are allowed on VAST trails during the VAST operating season.

Cross-Country and Backcountry Skiing

Public Comment Theme: We strongly support many of the recreation proposals in the existing draft LRMP including the official designation of the Camel’s Hump Challenge Trail, the Catamount Trail Relocation, expansion of Nordic trails associated with the Camel’s Hump Nordic Ski Association, and glade management in backcountry zones.

Response to comments: These proposals remain in the updated plan.

Public Comment theme: Designating the Camel’s Hump Challenge cross-country ski trail may have unintended consequences on the Montclair Glen Shelter and privy, and potential for new and unmanaged ski glades.

Response to comments: Because of the length and nature of the Challenge Trail, the DST does not anticipate a high degree of use. However, the DST will monitor the use of the Montclair Glen Shelter and privy and work with partnering organizations to address any overuse issues should they emerge. ANR will also work with the Catamount Trail Association (CTA) and local ski groups to make sure that any illegal cutting of vegetation is addressed. Unauthorized cutting of vegetation on state land, including trimming vegetation and cutting, in whole or in part, any size vegetation, is prohibited by law¹.

Public Comment theme: Consider additional backcountry ski management including in the vicinity of the old Callahan Trail in Duxbury as well as numerous other areas accessible to the Mad River Valley community. Craft a plan with flexibility that would allow cooperation on projects that have yet to be identified.

Response to comments: While managing backcountry skiing in the vicinity of the old Callahan Trail was discussed at public meetings in fall of 2017, this management action was mistakenly left out of the draft plan. The updated plan has been edited to include the potential to manage backcountry skiing in the vicinity of the old Callahan trail (see LMC 1.8F, 1.8G, 2.5J, and 3.0A).

The DST reviewed comments that advocated for managing backcountry ski zones throughout the CHMU. Many of these suggestions were in areas where this type of management would be prohibited by easement, or where encouraging higher visitation would be problematic due to lack of parking capacity, or they included areas that the DST specifically identified to be left not managed for recreation where other management objectives are prioritized. The updated LRMP includes the possibility of managing backcountry ski zones in two locations: in the vicinity of Bald Hill and near the old Callahan Trail.

¹ Any person who cuts, trims, or damages any vegetation on State land without permission may be subject to civil and criminal violations and fines. This prohibition applies to unauthorized cutting associated with backcountry skiing. The so-called “Timber Trespass Law,” Chapter 77 of Title 13 of the Vermont Statutes Annotated, also applies, and defines “timber” as including “sprouts from which trees may grow, seedlings, saplings, bushes, or shrubs that have been planted or cultivated by a person who owns or controls the property where they are located.” Other criminal and civil statutory provisions may also apply to unauthorized cutting or trimming of vegetation on State lands, and the Agency has and will pursue such violations, on a case-by-case basis.

Skiers should be aware that skiing is allowed anywhere on state land unless otherwise explicitly prohibited. It is the cutting of vegetation that is not allowed. While the DST understands the desire to write a plan that remains flexible and open to additional backcountry skiing opportunities, the nature of ANR plans is that new uses must be approved in a LRMP to allow for appropriate public input and consideration of the impacts on other natural resources. Consideration of further opportunities would require an amendment to this plan and an appropriate degree of public involvement, which are indeed possible.

Public Comment theme: ANR should consider the concept of “post logging skiing glades” as a dual purpose forest management technique. This would provide the opportunity for backcountry skiers to be able to utilize recently logged areas for skiing.

Public Comment theme: We do not support the idea proposed by other groups of removing tops and down woody material (coarse and/or fine) from timber harvest areas in order to create better conditions for backcountry skiing. This material plays a variety of important ecological functions for wildlife, soil health, and carbon sequestration, and should not be removed without careful consideration.

Response to comments: Timber management and backcountry skiing have been and can be compatible uses. The LRMP has been edited to allow for the management and use of ephemeral backcountry skiing zones in recently completed harvest areas. Implementation will occur in close collaboration with a local partner. The appropriate areas will be near an already existing winter trail and within LMC 3.0. State of Vermont licensed foresters will consider impacts of removing coarse and fine woody material and prescribe this only on sites with appropriate soil conditions. Such management will be limited in scope and encompass only portions of recently harvested stands and will depend on and vary with many site and access conditions.

Public Comment theme: The road through the Stevens Block should be left unplowed for cross country skiers.

Response to comments: The road through Stevens Block is plowed during some winters to facilitate the habitat improvement work that is conducted in accordance with the goals for the Stevens Block Wildlife and Forestry Demonstration Area (LMC 2.4H). Cross country skiing is an allowed use; however, FPR will continue to allow plowing on this road by those involved in management. There are other skid roads and trails that emanate from the main road in the Stevens Block which could be used by cross-country skiers.

Public Comment theme: Backcountry skiing is popular because it is unmanaged. Let people find the naturally occurring lines. ANR should not spend time or money developing glades. There is little evidence of damage to forests from unauthorized cutting.

Response to comments: Vermonters have demonstrated that backcountry skiing terrain is in high demand. Backcountry skiing is considered a form of dispersed recreation and is allowed anywhere on the CHMU and anyone who would like to ski un-managed, naturally occurring lines will still be able to find areas in which to do that.

Unauthorized cutting of vegetation on state land, including trimming vegetation and cutting, in whole or in part, any size vegetation, is prohibited by law for many reasons, including that it can indeed be damaging.

Due to an increase in backcountry ski use on public land in recent years, ANR will be proactive in addressing unauthorized cutting and pursue education and collaboration with partner organizations to prevent unauthorized cutting and any resulting damage through managing backcountry ski use in appropriate areas on all ANR lands. The plan would authorize FPR to manage backcountry ski zones in the vicinity of Bald Hill and the old Callahan Trail.

Public Comment theme: Additional high elevation ski zones pose a risk to wildlife.

Response to comments: Pro-actively managing growing uses like backcountry skiing can help steer use away from those wildlife habitats that are most susceptible to impact, and managing use and concentrating it in certain areas can provide a level of predictability for wildlife.

Public Comment theme: The maintenance and creation of glades, the relocation of the Catamount Trail, and the official designation of the Camel's Hump Challenge Trail is inconsistent with the enabling legislation that created the Ecological Area, the Camel's Hump Natural Area, and the purpose of the Hub Vogelmann Research Area. These uses will lead to a degradation of the "wilderness feel" of this area, as well as the ecological function of the forest.

Response to comments: The LRMP authorizes ANR to consider options for management of backcountry skiing, designate the Camel's Hump Challenge Cross-Country Ski Trail, and relocate the Catamount Trail into areas of the CHMU that are part of the Ecological Area, Natural Area, and Hub Vogelmann Research Area. There seem to be two main considerations for these activities: 1) whether the activity is allowed by statute that created the Natural Area and Ecological Area, or the Hub Vogelmann Research Area, and 2) whether the activity would have an unacceptable adverse impact on forest health and wildlife.

Recreation management is compatible with the purposes established for the Ecological Area and Research Area. Both statutes permit the establishment of compatible uses, including recreational uses, and recreation use is common in many state Natural Areas. Chapter 77 of Title 10 of the Vermont Statutes Annotated, which established the Camel's Hump State Park and Forest Reserve and the Ecological Area, was amended in 1975 to add 10.V.S.A. § 2353(a) which specifically authorizes the Department of Forests, Parks and Recreation to establish other permitted uses within the three Use Districts through the adoption of a comprehensive management plan for Camel's

Hump State Park. Many of the trails on Camel's Hump pre-date the designation of the Ecological Area and the Natural Area, and the existence of these trails were specifically recognized in the legislative history of Chapter 77 of Title 10 and in the Natural Area Designation.

While the statute that defines the use districts (10 V.S.A. §2353) emphasizes the "wilderness aspect" of the Ecological Area, and Natural Areas (10 V.S.A. §2607) are defined as those areas which "have retained their wilderness character, although not necessarily completely natural and undisturbed," both statutes permit the establishment of compatible uses, including recreational uses. Wilderness qualities in these designations are not to be equated with those of the U.S.D.A. Forest Service's Wilderness Areas, nor shall USFS criteria be applied to Agency designations.

The draft plan released in October 2017 included a map of the Hub Vogelmann Research Area as part of the Land Management Classification Map. The Research area corresponds to LMC 2.6K and 1.9I. ANR further investigated the origins of the Research Area and determined that the actual research area is much smaller than that which had been mapped in the draft plan of October 2017. The LMC map (map 18) has been updated with the actual boundaries.

Correspondence between Hub Vogelmann and FPR personnel suggest that the Research Area was meant to be free of the influence of timber management. The original long-term vegetation monitoring plots were set up on either side of the already existing Burrows Trail, so the original intent of the Research Area inherently recognizes recreation as a compatible use, and in this case, one that pre-dates the establishment of the Research Area. Much of the backcountry ski use today is outside of the Research Area and uses the Burrows Trail for access.

While the use on the Burrows trail has increased, there is no commensurate impact on the vegetation monitoring plots from hiking. Backcountry skiing, which is not confined to the Burrows trail has a much greater potential to impact the vegetation monitoring plots and the integrity of the Research Area as a whole. Given the present level of un-managed use, there may already be impact.

Relocation of the Catamount Trail, re-routes associated with the Challenge Trail, and the details of implementation of backcountry ski zone management will require further DST review to minimize impact on wildlife habitat, water quality, and forest health, and ensure compliance with all relevant ANR policies and procedures.

Public Comment theme: Illegally cut ski glades have become a problem on state land. Enforcement actions are in order rather than cooperation with the offending parties.

Response to comments: Unauthorized cutting of vegetation on state land, including trimming vegetation and cutting, in whole or in part, any size vegetation, is prohibited by law. In those places where illegal cutting of trees and shrubs continues, ANR works with enforcement officials and local partners to address cutting. ANR is proactive in addressing unauthorized cutting and pursue education and collaboration with partner organizations to prevent unauthorized cutting and any resulting damage.

Vermonters have demonstrated that backcountry skiing terrain is in high demand. The most effective way for ANR to prevent damage associated with unauthorized cutting may be to identify and manage backcountry ski zones in appropriate locations and with a high level and quality of user cooperation and involvement. The plan would authorize FPR to manage backcountry ski zones in the vicinity of Bald Hill and the old Callahan Trail.

Public Comment theme: Maintenance of illegally cut ski glades and the creation of new glades should be contingent upon a commitment by partnering organizations to address, monitor and curtail illegal use in sensitive areas, particularly the Hub Vogelmann Research Natural Area. Furthermore, this is an opportunity for ANR to invest in glade restoration in highly impacted areas, as well as conduct research into the impacts of winter recreation on wildlife and forest dynamics.

Response to comments: The plan has been edited to reflect that ANR may act to manage backcountry ski use with or without a partner. Management actions may range in scope and include simple signage directing people to avoid a certain area, designating a “skin” trail for skiing to the top of the Bald Hill ridge, and even establishing and managing skiable lines through cutting of vegetation. For the DST to look favorably on a proposal to create *new* backcountry ski zones, ANR would need a strong cooperative agreement with a qualified partner to help monitor and curtail illegal cutting of vegetation in non-designated areas.

ANR recognizes the importance of researching the impacts of winter recreation on forest health and wildlife. ANR regularly partners with academic institutions on research and would willingly partner on a project within the Bald Hill area. At the same time, backcountry skiing may already be having an impact and ANR will be proactive in addressing the impacts.

Public Comment theme: Encourage recreational partners to develop proposals for new glades in areas where such use is ecologically appropriate and avoid areas designated as Natural Areas or Ecological Areas. Do not allow glade management in the Gleason Brook drainage and other parts of the Ecological Area.

Response to comments: The DST will work with groups to identify those places that are less sensitive and more appropriate for proactive backcountry ski management, with the understanding that the terrain is the driving factor in where people want to ski. Portions of the Natural Area and Research Area are popular skiing destinations because of their elevation, forest type, slope, and aspect, and this use is compatible with these designations provided there is no illegal cutting of vegetation. The plan does not propose the creation, maintenance, or expansion of backcountry ski zones in the Gleason Brook drainage.

Hiking

Public Comment theme: To alleviate pressure on the existing summit approach trails and parking areas, ANR should build a new and more sustainable trail to the summit from Honey Hollow.

Response to comments: There are four main approaches to the summit including short day hikes from the Burrows and Monroe trailheads, and longer approaches from the north and south on the Long Trail. A new trail to the summit of Camel's Hump could potentially alleviate some overcrowding issues on other trails and at other parking areas, however it is likely to spawn a new set of challenges in terms of road and trail maintenance.

Public Comment theme: The proposal in the draft LRMP to re-open the Callahan Trail is sound in theory but will not lead to any reduction in the impact on the other summit trails, only add more trail mileage to maintain. Funding for trail maintenance is already limited and this project would further stretch budgets.

Response to comments: After further discussion and review of public comments, the DST has removed rebuilding and reopening the Callahan Trail for summer use from the plan. The plan has been edited to reflect this decision (see LMC 1.8F, 1.8G, 2.5J). Reopening this trail for hiking use would have been very costly while the existing trails to the summit are already in great need of maintenance. Furthermore, trail use, and trail impact do not have a linear relationship and cutting down traffic on the Monroe trail would not likely have a commensurate decrease in impact or maintenance cost.

The plan has been edited to allow management of backcountry ski use on the Callahan Trail (see LMC 1.8F, 1.8G, 2.5J, 3.0A). This area is already popular. At present, users ski up the Monroe trail and descend through the woods near the old Callahan Trail. The plan would allow FPR to manage this growing use to enhance recreational opportunities and to minimize impact to forest health and wildlife from un-regulated cutting of vegetation, without the same costs associated with maintaining a year-round hiking trail.

Snowmobiling

Public Comment theme: The existing VAST trail system is an important resource. ANR should maintain and possibly expand snowmobile trails in the CHMU.

Response to comments: The VAST trails in the CHMU are an important resource. There is no proposal in the plan to change the extent of the VAST trail system.

Multi-Use Recreation Resources

Public Comment theme: ANR should consider accommodating new huts proposed by the Vermont Huts Association in Honey Hollow, the Lions Ridge Area, Phen Basin, and adapting use of the Caretaker Cabin at the Monroe Trailhead.

Response to comments: The plan has been edited to allow consideration of a hut in the Honey Hollow Area (LMC 3.0A) or the Lion's Ridge Area (LMC 2.5J) but not both. The plan has also been edited to allow consideration of a hut in LMC 3.0A in association with the potential Velomont Trail. The presence of a new hut or new trail would not alter other plans for these areas, including timber harvesting. ANR was not supportive of a hut in Phen Basin or adopting the Caretaker Cabin for use by the Vermont Huts Association.

Motorized Access

Public Comment theme: ANR should restrict motorized recreation on the property.

Public Comment theme: ANR should allow regulated ATV access in the forest.

Public Comment theme: Although at this time, ATV use is prohibited on state land, there may be a time in which connector trails may be allowed. We encourage language that will consider a request for a connector ATV trail at such time as it becomes legal.

Response to comments: The plan does not propose any changes to motorized access on the CHMU. At present, ATVs are by rule not allowed on any ANR lands unless they are being used for management or emergency response purposes or by visitors with a mobility disability who have obtained the necessary permissions. If in the future ATVs are allowed on state land through changes in rule, they will be accommodated in the CHMU in the context of a statewide policy governing their use on ANR lands. No language was added to the plan that would complicate implementation of such a policy.

Recreation, Large Forest Blocks and Maintaining Areas Free of Trail Networks

Public Comment theme: Construction of new trails on the CHMU should be limited to strategic connections between existing trail networks, with a priority given to connections between trail networks that are already protected. Additional trail systems are not necessary on, around, or near the summit of Camel's Hump.

Response to comments: The plan would allow for the construction of new trails, most of which in the vicinity of other trail networks (adjacent to the Camel's Hump Nordic ski area, for instance), or provide strategic connections between existing trail networks (Velomont Trail, for instance). These strategic connections are very important for user groups to ensure permanent access to trails, as placing these connections on private land leaves them subject to closure with property transfer. The

plan would authorize the use of the Camel's Hump Challenge Trail and the potential for backcountry ski management near Bald Hill, but these are the only proposals for trail or recreation development around or near the summit, and these are still well below the alpine area.

Public Comment theme: Any large proposals for trail construction that have the potential to result in adverse impacts to wildlife, water quality, or sensitive ecological features should go through proper environmental review, and should involve some kind of plan amendment and opportunity for public input.

Response to comments: The specific recreation proposals in the plan were reviewed by the DST and impacts to forest health, wildlife habitat, water resources, and more were considered when evaluating suitability of the proposal. Furthermore, each proposal in the plan will receive additional review from the DST in the process of identifying the actual trail corridor, including a robust field review and consideration of site conditions and features.

Permanent creation of new recreation corridors not identified in the current plan would require ANR approval and an amendment to the plan prior to implementation, a process which involves public comment.

Public Comment Theme: There seem to be no checks and balances on recreational development schemes on the large forest blocks. Recreational Trails Program grant funding has been spread around the state to construct recreational infrastructure in large forest blocks with only internal review.

Response to comments: Proposals for recreational development on state land are evaluated by the managing DST. This group considers a wide variety of factors prior to implementing or denying a specific request.

FPR administers the Federal Highway Administration's Recreation Trail (grant) Program which is an important funding source for trail management on the CHMU and other ANR properties as well as private land. Disbursement of these funds and associated review is beyond the scope of this plan.

Public Comment theme: Finding suitable hunting spots is more difficult as time goes on. Trails seem to be plenty and growing. Trail networks should be closed during the months of October, November, December, and May for the small game, big-game and turkey hunting seasons. Trail closure would minimize conflicts between traditional users and other user groups, allow wildlife time to re-occupy these areas, and improve the overall hunting experience.

Response to comments: The entire CHMU is open to hunting, in accordance with state laws. It is true that the CHMU is home to very popular trails, however there are still large portions of the property that are not adjacent to popular hiking or biking trails. FPR collaborates with recreation

groups to raise awareness about hunting seasons and encourages other recreationists to wear high-visibility orange. During deer Regular Season FPR and recreation partners encourage visitors to seek outdoor opportunities that don't conflict with popular hunting areas. Mountain bike trails are officially closed from November 1 through Memorial Day, which span which spans several popular hunting seasons. Hiking trails are not officially "closed" except during spring mud season.

Public Comment theme: Large blocks of forest with minimal or no trail networks are extremely important for wildlife and for those looking to explore the woods by foot, without trails. Areas like this are growing less common. ANR should adopt a 5th land-use classification that designates significant areas on the CHMU and all other appropriate public lands for dispersed, non-motorized, non-mechanized recreation with minimal or no trail networks, representing habitats and elevations throughout the CHMU and other ANR lands.

Response to comments: We agree with the importance of areas available for dispersed backcountry enjoyment. Balancing the requests of recreation groups with the importance of maintaining portions of the property that are not impacted by trails is one of the greatest challenges in the CHMU and many other ANR properties. The default recreation management strategy for land in the CHMU is to manage for dispersed backcountry recreation. ANR requires any deviation from this management strategy to occur through existing designated trail corridors, or proposals for new uses and trail corridors. Permanent creation of new recreation corridors or changes in use of existing corridors not identified in the current plan would require ANR approval and an amendment to the plan prior to implementation. Furthermore, the plan identifies certain areas where the DST feels that future trail development should be prohibited, for instance LMC 1.8H.

Increasing Recreational Demand, Parking, and Access

Public Comment theme: Camel's Hump is an enormously popular hiking destination. The plan minimizes the impact that hikers are having on the summit trails. ANR needs to evaluate the carrying capacity of Camel's Hump and its summit trails with regard to the impact that visitors are having on the mountain itself and on the visitor experience.

Response to comments: The trails do experience an enormous amount of use and the impact on the tread is apparent. These trails are maintained by volunteers, summit caretakers, and by paid trail crews. FPR is considering ways to improve and harden the existing tread, potentially re-route unsustainable portions of the trail to more appropriate grades, and better manage visitor use.

Public Comment theme: The hiking trails are severely degraded and overcrowded, yet the plan suggests that in the future, ANR might expand the parking areas. Instead, ANR should explore options to limit

visitation through implementation of a permit system, charging a fee, hiring a trail-head attendant, or enforcing parking restrictions.

Response to comments: Parking is very limited at both the Burrows Trailhead in Huntington and the Monroe Trailhead in Duxbury. ANR is aware of the issue and is dedicated to finding a solution. The goal of expanding parking areas would be to better accommodate the existing level of use. ANR is actively exploring the expansion of existing parking capacity. There are no immediate plans to hire a park attendant, limit use through a permit system, close trails, or impose fees, but these options may be utilized in the future. Any significant change to the management structure of existing parking areas would be presented to the public prior to implementation.

Public Comment theme: The speed limit signs on Camel's Hump Road in Huntington are not effective. The speed limit should be lowered to 20 mph. The "No Parking" signs are ignored, and regulations are not enforced.

Response to comments: ANR has no legal authority to establish or enforce speed limits or parking restrictions on town roads, nor can ANR change the posted speed limit on a town road. ANR has installed signs over the years encouraging hikers to drive slowly and be respectful of neighbors.

Public Comment theme: Please consider methods to control dogs. There are too many off-leash dogs, and too much dog waste.

Response to comments: Signs are posted at trailheads and trails discussing expected dog etiquette. Dogs should be under voice control at all times, stay on the trail, and be leashed when in proximity to large groups, and when in the alpine zone or other sensitive areas. Green Mountain Club (GMC) Summit Caretakers are also proactive about asking visitors to leash their dogs. Opportunities to enhance education and outreach will continue.

Public Comment theme: ANR should increase road improvement and maintenance budgets for state owned forested properties. Road closures due to lack of maintenance threaten recreational access.

Response to comments: Additional funding would help ANR maintain and improve roads and trails and staff has been exploring funding opportunities. FPR's forest and park road appropriation has been level funded for over a decade. ANR maintains public access to roads and trails to the best of our ability with current resources and creativity.

The Recreation Assessment

Public Comment theme: Appendix G (Recreation Use Data) should be removed as it is inaccurate and incomplete. Instead, the plan should include a thorough analysis of the value of recreation on the CHMU and its importance to state coffers.

Response to comments: Appendix G does not purport to represent the absolute number of hikers, and only captures the number of hikers that have signed in at trailhead registers. It does reflect an accurate trend-line showing an increase in use at the most popular trailheads and a valuable reference for planning.

The DST has not conducted a thorough analysis of the value of recreation on the CHMU, however the economic impact of recreation use on the CHMU is of great importance to surrounding communities. Several economic impact analyses related to recreation have been conducted in Vermont in recent years.

Public Comment theme: The Recreation Opportunity Spectrum map categorizes the summit of Camel's Hump as "semi-primitive, non-motorized." One criterion of this category is that "interactions between users are low." On many days, this is not an accurate description of the summit and its approach trails.

Response to comments: The USDA Forest Service Recreation Opportunity Spectrum (ROS) is a framework that uses three main components to delineate ROS class: physical setting, social setting, and managerial setting. The user density falls under the social setting component and is one of seven mapping criteria, the others are: remoteness, size, evidence of humans, managerial regimentation, and managerial noticeability. When combined, these criteria and components are intended to capture the characterization of an area. The summit and the approaching trails meet nearly all criteria for the semi-primitive non-motorized ROS Class, however, the social setting criteria for this ROS category is defined as "low to moderate contact frequency." Guidance in the Forest Service ROS guide explains that contact frequency can vary with location, day, season and conditions and that users can expect a higher number of parties at designated concentration points (e.g. a summit, trails leading to that summit). When taken as a whole, the summit and its approach trails are more representative of the semi-primitive non-motorized ROS class than any of the other categories.

Timber Management

Extent of Timber Management

Public Comment theme: The draft plan does not include enough active woodland/timber management. More lands within the CHMU should be managed for timber, and more acreage should be scheduled in the upcoming management cycle. This management is important for wildlife habitat and the rural economy.

Response to comments: The total area of the CHMU that is suitable for timber harvesting has been updated in the new plan and consists of approximately 7,483 acres. This represents the area in which timber harvesting is not restricted through deed, easement, or legislation, or limited by terrain or access. A third party owns the timber rights on approximately 1,467 acres and approximately 122 acres are not forested. The remaining area of approximately 16,837 acres will not be harvested. ANR considers many objectives when making management decisions. Map 11 depicts those areas that are and are not available for potential timber management.

The areas proposed for harvest in the next 15 years (3,749 acres) were identified based on their current condition using existing forest inventory data and a reasonable expectation for how much could be accomplished on an annual basis, given professional staff capacity.

Public Comment Theme: The area to be logged is too large and lacks provisions for sustainability. There are no plans for restoration, reforestation, or preservation of habitat. With the plan purporting that 8,500 acres are suitable for logging, ANR intends to harvest 44% in the next 15 years, approximately 3% per year. Northeastern forests grow at about 1% per year. The harvest schedule is unsustainable and should be scaled back.

Response to Comments: The plan has been edited to reflect that the area suitable for timber harvests is approximately 7,483 acres. The plan proposes to conduct harvests on approximately 3,749 acres in the next 15 years (50% of the total operable area). The area scheduled to be harvested is based on science and silvicultural guides and is consistent with the approach that many landowners use in managing forests in New England. Northern hardwoods stands are typically managed on a 20-30 year cycle which puts ANR on track to manage most of the operable area in the next 30 years. This does not mean every tree will be harvested. Most of this area will be harvested using uneven-aged techniques. This means that individual trees, small groups of trees, and occasionally, larger patches will be removed with intention of regenerating new trees and improving growth and vigor on retained trees. Most of the area will be managed with single tree and group selections harvests and less than 1/3 of the timber volume is typically removed in a single entry. Only 2-5% of the managed area will be harvested in patches of 2-10 acres in size, which will comprise only portions of stands.

Even-aged methods including intermediate thinnings and shelterwood practices may also be appropriate.

Unlike in many other regions, silviculture in the northeast rarely requires “reforestation” by planting. The goal of the harvest is to take advantage of natural regeneration and allow trees to grow back naturally. Harvesting alters the availability of light to the forest floor, thereby stimulating a response from tree seedlings and seeds that are already present. Replanting trees is a method more typical of industrial forestry in other regions of the country.

All areas that are scheduled for timber harvests have been harvested before, sometimes repeatedly. Historically, some stands have been harvested in ways that reduce the structural complexity of the

forest and limit its ecological function and utility as habitat for certain wildlife species. In many ways, scheduled harvests are a method of restoration meant to diversify forest structure and increase the forest's complexity and resilience to disturbances.

Silvicultural Methods

Public Comment theme: ANR should only practice single tree selection. Do not create gaps that are greater than one tree length in diameter.

Public Comment theme: ANR should not practice single tree and group selection. These silvicultural methods do not create enough light to regenerate pioneer and intermediate species and favor only climax and shade tolerant species.

Response to comments: The size of canopy gaps created during timber harvests is an important factor in determining the response of existing vegetation and regeneration or the likelihood of recruiting new tree regeneration or a growth response in retained trees. The plan does not propose any restrictions on the size of gaps in uneven-aged silviculture regimes. These decisions are best made after field visits. Foresters are always concerned with recruiting adequate tree regeneration, and in turn they vary the size of openings based on soil type, aspect, slope, herbivore density, height of surrounding trees, and presence and composition of existing vegetation. In some places, a canopy gap that is only one tree length in diameter would not be adequate to recruit desired regeneration. In other places, it might be just right.

Public Comment theme: ANR should increase its goal for early successional (young forest) habitat to 5%-20%. These young forests are more valuable for wildlife than older forests. Minimum size threshold for early successional habitat should be changed from 2 acres to 5 acres.

Response to comments: Early successional habitat is an important habitat feature in Vermont and one that is under-represented in the Northern Green Mountain Biophysical Region. Fifty-four *Species of Greatest Conservation Need* are supported by young forest. The plan has been edited to target a goal of 2-5% young forest habitat on the actively managed forest lands of the CHMU, raising the goal from 1-2% in the draft released in October 2017. [Vermont Conservation Design](#), a scientific effort led by F&W and FPR, with guidance from partner organizations, identified 5% young forest as a goal for the Northern Green Mountain Biophysical Region. It may not be possible to reach this goal on the CHMU, but 2-5% is within the realm of natural variation for the region.

Public Comment theme: It is not necessary for ANR to create young forest habitat. Even-aged forest stands will naturally diversify on their own. The plan should focus more on growing stands into older age classes through passive means and uneven aged management.

Response to comments: The plan would employ both uneven-aged and even-aged silvicultural treatments. While the plan identifies an early successional habitat goal of 2-5% of actively managed timberland, most management will utilize uneven-aged techniques. These most closely approximate the natural disturbance regimes that dominate northern forest types and are more adept at creating structural complexity in the forest for the benefit of wildlife and in pursuit of resilience to future forest health threats.

Public Comment theme: There are a variety of silvicultural treatments that create young forest conditions for breeding birds. The plan should recognize that any treatment that reduces canopy cover to less than 30% effectively creates young forest conditions. If the plan only recognizes patch cuts and clearcuts as methods for creating these conditions, other silvicultural treatments like shelterwood harvests may push the landscape percentage higher than necessary.

Response to comments: Certain shelterwood practices may create areas of low canopy cover and dense regeneration, but these conditions are typically short-lived compared to the young forest created through patch cuts. The presence of residual mature trees also affects which wildlife species use these areas. The plan recognizes patch cuts as methods for young forest creation but identifies a target range of young forest abundance (2-5%) in the CHMU, allowing foresters and biologists flexibility to consider the larger landscape context and surrounding forest conditions when planning patch cuts.

Public Comment theme: ANR should utilize whole tree chipping to hasten the transition from over-mature pioneer regeneration to a more normal mixed species stand.

Response to comments: Whole-tree harvesting will be considered on portions of certain timber harvests. Decisions to use whole-tree harvesting will be made on a stand-by-stand basis during the process of writing the silvicultural prescription, and relate to soil type and quality, merchantability, silvicultural goals, terrain, and other factors.

Public Comment theme: The plan includes forward-thinking language about sustainable forest management, but the key to sustainability is the practices themselves: the stand-level prescriptions, road layout, performance requirements of operators, and the monitoring of results. Past treatments, for example in the Cobb Brook area, were simply business-as-usual logging: stand-wide "diameter cuts" of all mature or maturing timber, significant residual stand damage, and the harvest of trees inside a perennial stream course (contrary to the spirit and intent of VT AMPs).

Response to comments: Silvicultural prescriptions are created by State of Vermont licensed foresters and reviewed by the DST, including wildlife biologists and the state land ecologist. Harvests are inspected on a regular basis by FPR foresters and corrective action is taken if

foresters observe excessive residual damage, the removal of unmarked trees, or a failure to implement appropriate AMPs on roads, landings, and skid trails.

The most recent harvest in the Cobb Brook area was completed in 2013. The existing stand was two-aged and the harvest objective was to transition the stand towards uneven-aged conditions using single tree and group selection. Trees were marked for removal in all diameter classes.

Carbon Sequestration

Public Comment theme: Vermont should halt all commercial logging on state land to maximize carbon sequestration in the forest. Unmanaged woodlands sequester more carbon than managed woodlands.

Response to comments: ANR considers many objectives when making management decisions and manages forests for a variety of benefits, including wildlife habitat, sustainable production of forest products, species diversity, resilience to disturbance, carbon sequestration and storage, and more. ANR will continue to manage for timber production on approximately 7,483 acres of the CHMU. A third party owns the timber rights on approximately 1,467 acres and approximately 122 acres are not forested. The remaining area of approximately 16,837 acres will not be harvested.

Public Comment theme: Silvicultural decisions should consider the role of forest management on carbon sequestration.

Response to comments: Silvicultural decisions do and will consider the role of forest management on forest carbon stocks, in addition to a variety of other considerations, including wildlife habitat, species diversity, resilience to disturbance, and more. Silvicultural decisions often have co-benefits, for instance, the total amount of carbon storage can be increased by managing on longer rotations, growing trees to a larger size, and enhancing structural complexity within a forest stand. These actions can also improve habitat for certain interior bird species. Silvicultural decisions are based on meeting multiple objectives, including forest carbon dynamics.

Public Comment theme: ANR should market CHSP's forests to green investors, local companies and national companies interested in carbon offset investments.

Response to comments: In 2019, the Vermont General Assembly passed Act 83 that established the Vermont Forest Carbon Sequestration Working Group *to study how to create a statewide program to facilitate the enrollment of Vermont forestlands in carbon sequestration markets*. The Working Group was charged with evaluating several aspects of forest carbon sequestration, including the feasibility of enrolling state-owned land in carbon offset markets. The [report](#)

includes a recommendation that ANR analyze the feasibility of developing a forest carbon offset project for at least one parcel of state land; this work is currently in progress.

Economics

Public Comment theme: Timber sales on state land are conducted at below market rates, which amounts to a handout from state lands to loggers. The revenue does not cover the cost of the employees who plan the timber sales or the infrastructure necessary to access the timber sales. The plan fails to make a business case for logging and does not reflect best practices in accounting for social and economic values.

Response to comments: ANR does not conduct timber harvests at below market rates. Timber sales are marked by FPR's State of Vermont licensed foresters, based on a detailed prescription written in consultation with ANR biologists and an ecologist. The rights to cut and harvest only the wood that has been marked is then purchased by a third-party through a comprehensive legal contract. The sale of the timber is conducted through a competitive bidding process following procedures and closed-envelope bidding. In most cases, the timber is sold to the highest qualified, eligible bidder.

An analysis of revenue and timesheet coding shows that between 2002 and 2015, FPR netted \$925,548 from timber sales within Camel's Hump State Park and Camel's Hump State Forest. This amounts to \$868 net revenue per acre that is harvested.

The plan does include a proposal to spend significant funds on road and bridge infrastructure in the next 15 years. These improvements enhance access for forest management and public recreation for skiers, hikers, equestrians, snowmobilers, hunters, bird watchers, and many more.

Forest management decisions are not made based on revenue expectations. Sustainable forest management helps create important wildlife habitat, enhances the resilience of forest ecosystems, and supports local jobs in the wood harvesting and manufacturing sectors, while remaining compatible with other management goals.

Public Comment theme: Where do timber sale receipts go?

Response to comments: Timber sale receipts are used for different purposes depending on whether the harvest occurs on State Park, State Forest, or Wildlife Management Area (WMA) land.

Receipts from harvests on Camel's Hump State Park (2786 acres or 74% of the total prescribed area) contribute to the *Forest Parks Revolving Fund*, more typically referred to as the *State Parks Special Fund*. These funds are used for the planning, design, development, operation, and

maintenance of Vermont's State Parks. Further details about the purpose and establishment of the *Forest Parks Revolving Fund* can be found in the enabling legislation ([10 V.S.A. § 2609](#)).

Receipts from harvests on Camel's Hump State Forest (447 acres or 12% of the total prescribed area) contribute to the *Lands and Facilities Trust Fund*. Expenditures from this fund are meant to support management activities on all ANR lands including the maintenance of roads, trails, facilities, forest, and habitat improvement, and more. In recent years, this fund has been used to support management of invasive plants at Alburgh Dunes State Park and Round Pond State Park, restoration of historic barns in Camel's Hump State Park, riparian buffer planting at Lake Carmi State Park, roadside mowing in Mt. Mansfield State Forest, and many other valuable projects. Further details about the purpose and establishment of the *Lands and Facilities Trust Fund* can be found in the enabling legislation ([3 V.S.A. § 2807](#)).

Receipts from harvests on Huntington Gap WMA and Robbins Mountain WMA (516 acres or 14% of the total prescribed area) contribute to the *Fish and Wildlife Conservation Fund*. Timber sale receipts are specifically tracked so that all income is spent on management and improvements to WMAs. Because these funds are not considered "federal funds" F&W is able to use them as 25% match to federal Pittman-Robertson federal funds. For every dollar received from timber harvests on WMAs, F&W can achieve \$4 worth of Pittman-Robertson funds to improve WMAs. Examples of how timber sale revenues are invested include invasive plant control to improve or restore wildlife habitat, restoration of wetlands, improvements to parking facilities, kiosks or boardwalks, or inventories for rare natural communities to ensure those areas are protected in long range management plans.

Public Comment theme: Timber is being sold to out of state loggers and processed at out of state facilities. The profits leave the state while the impacts remain in the local community.

Response to comments: ANR sells marked or designated timber on a competitive bid basis to a purchaser who pays for the standing timber in advance. By contract, ownership of the timber is transferred to the purchaser when the timber is cut. ANR cannot legally dictate where the wood is processed. This is at the sole discretion of the timber purchaser.

Many forest product markets are regional in nature due to economies of scale. For example, no pulp mills (used in the manufacture of paper) exist in Vermont or New Hampshire, so those products must travel to markets in Maine or New York to be processed. Likewise, the closest markets to Vermont for spruce and fir logs, destined for use as framing lumber, are found in Quebec, New Hampshire, and Maine. However, much of the hardwood sawtimber harvested in Vermont is processed in the state. Roughly 60% of all the hardwood sawtimber harvested in Vermont is processed in Vermont. Many of the timber sales on the CHMU are purchased by companies that supply Vermont sawmills or by mills themselves that process the wood in-state.

There is also a robust local market for firewood, nearly all of which is processed and consumed locally. Vermonters use an estimated 410,000 cords of wood annually to heat their homes- over 80,000 of that is estimated to be used in Chittenden and Washington Counties alone².

Public Comment theme: Logging will put increased pressure on local roads which receive no maintenance funding from the state.

Response to comments: Management actions, as well as recreational visitors to the CHMU can increase pressure on local roads in much the same way that management actions on private land can. ANR does not give towns funding specifically for the maintenance of state roads. ANR does make Payments In Lieu of Taxes (PILOT) which towns determine how to best use.

Ecological Concerns

Public Comment theme: Timber harvesting will have a negative impact on wildlife. ANR should consult wildlife experts to determine the detrimental impacts of timber harvesting activities on wildlife habitat, wildlife corridors, and forest fragmentation.

Response to comments: Wildlife biologists are indeed an integral part of the DST and are involved with every decision made on the CHMU. They play a prominent role in writing and reviewing silvicultural prescriptions to ensure that forest management activities have the desired impact on wildlife habitat.

Forest management including harvesting is not a form of forest fragmentation because it does not convert forest to another land use, like agriculture or residential areas. Managed forests remain forests. The main contributor to forest fragmentation in Vermont and in the periphery of CHMU is the result of subdivision and development areas.

Public Comment theme: The draft plan does not provide adequate protection for old growth forests slated for logging. ANR only advocates for “young forests” and ignores the habitat benefits of old growth forests.

Response to comments: There are no “old-growth” forests scheduled for timber management in this plan. All areas that are scheduled for timber management have been harvested before, sometimes repeatedly. The plan identifies approximately 7,483 acres of the CHMU as available for commercial timber harvesting, with approximately 3,749 acres scheduled for management in the next 15 years. The timber rights on an additional 1,467 acres are owned by the Eaton family and managed by the A. Johnson Company. An additional 122 acres are non-forested. The remaining 16,837 acres (65% of the total area of the CHMU) will be able to develop naturally

² [*Vermont Residential Fuel Assessment for the 2018-2019 Heating Season.*](#)

into older forests. ANR advocates strongly for the importance of old forests. [Vermont Conservation Design](#) sets a target of allowing 10% of Vermont’s forest to develop and maintain old forest structure and function. On the CHMU 65% of the total area will be allowed to develop into older forests, which significantly advances the VCD goal.

Public Comment theme: The existing draft plan has a very strong bias toward control and forest management. Consider placing much more emphasis on forest ecosystem conservation and enhancing the forest's capacity for self-renewal. Logging will diminish one of Vermont’s most important wilderness areas.

Response to comments: Forest ecosystem conservation and forest management are not mutually exclusive. Still, 65% of the total acreage of the CHMU is unavailable for the purpose of timber harvesting. It is true that timber harvesting can temporarily change the feel of an area and remind visitors that they are in a landscape that has been shaped by humans for hundreds of years. While Camel’s Hump is not a federally designated Wilderness Area, there remain large portions of the CHMU where one can find solitude and little obvious physical evidence of humans.

Public Comment theme: While some of the parcels to be logged have been heavily cut in the past, other parcels are hemlock-northern hardwood stands of statewide significance.

Response to comments: Hemlock-northern hardwood natural communities are a “matrix” community that is distributed broadly across the landscape and occurs at large scales. There are hemlock-northern hardwood stands of statewide significance that are scheduled to be managed. 93% of the entire CHMU comprises “state-significant” natural communities, a fact that is largely driven by the sheer size of the forest block. Timber harvesting is compatible with maintaining or even improving the quality rank of significant matrix-type natural communities, when it is done in a way that emulates patterns and impacts of natural disturbance. Therefore, State of Vermont licensed foresters, biologists, and ecologists review silvicultural prescriptions and harvest plans prior to implementation.

Public Comment theme: Much of the park is on ledge, with thin, acidic soils prone to erosion; constant harvesting on poorly designed logging roads only increases erosion, soil compaction and loss of critical mycorrhizal fungi, leading to poorer timber production in the future, and more flooding events.

Response to comments: Much of the CHMU does have thin, acidic, and shallow soils. Soil condition was included in the analysis to determine the extent of the area that could be managed. Additionally, the DST considers soil characteristics when developing silvicultural prescriptions and harvest plans. FPR’s State of Vermont licensed foresters implement the appropriate practices to mitigate erosion and soil compaction, including limiting the season of

operation and equipment type, when necessary. Most forest management is conducted in the winter to allow travel over snow and minimize soil disturbance.

While changes in vegetation within a watershed could lead to short-term changes in yield and streamflow, the size of the harvests in the CHMU in comparison to the watersheds is small. Proper implementation of *The Acceptable Management Practices (AMPs) for Maintaining Water Quality on Logging Jobs in Vermont* and the *Agency of Natural Resources Riparian Management Guidelines* will protect the soil and tributaries from adverse impacts related to harvesting.

Public Comment Theme: Logging will lead to the introduction of invasive plants and pests including emerald ash borer, hemlock woolly adelgid and the crazy snake worm. All logging should be halted upon the discovery of emerald ash borer or hemlock woolly adelgid.

Response to comments: Timber harvesting can lead to the introduction of non-native invasive plants. ANR requires all logging and earth-moving equipment is cleaned of visible soil and plant material prior to entry onto the CHMU. Additionally, forest access roads and landings are the starting point for our annual efforts to “monitor for early detection and removal of invasive plant species” (section IV.B).

It is unlikely that timber harvesting would lead to the introduction of emerald ash borer (EAB), as these pests travel in untreated ash logs and there is no reason that logs would be brought onto the CHMU. Timber sale operators on state land are required to enact practices meant to “[Slow the Spread](#)” of EAB.

At present, there is no evidence that crazy snake worms are introduced through timber harvesting or road-building activities, however it is not impossible. ANR land managers are attuned to the signs of crazy snake worm presence and annually monitor for their presence

Public Comment theme: Past logging operations have failed to build proper stream crossings and left behind lots of garbage. Some have even led to water quality violations, most recently in 2013-2014.

Response to comments: There is a long history of timber harvesting on the CHMU by ANR and previous landowners. Undoubtedly there have been operations that did not implement the appropriate water quality protection measures. The standards are a lot stricter now than they were decades ago when violations occurred. FPR staff regularly visit and oversee active timber sales to ensure compliance with Acceptable Management Practices for Maintaining Water Quality on Logging Jobs and other best practices to protect water quality. No water quality violation on the CHMU was reported to FPR staff or DEC Enforcement officials related to harvesting on the CHMU.

Compatibility with Park Goals, Existing Deed Restrictions, and Historic Trends

Public Comment theme: The new plan entails a drastic increase in the amount of timber harvesting over the past 30 years. Is this the result of a new timber management philosophy on state land? Is this new approach sustainable?

Response to comments: The proposed harvesting is not the result of a new timber management philosophy. Harvest areas were identified based on forest inventory data and local knowledge of the land base. The previous plan for Camel's Hump State Park was more ambitious than this plan in proposing areas for harvesting. Many of those areas were found to be inoperable or non-commercial, and others appear as holdovers in this plan.

Sustainable management allows forests to "maintain their health, productivity, diversity, and overall integrity in the long-run, in the context of human activity and use" ([Vermont Forest Action Plan](#), 2017). The timber management approach will ensure the continued health, productivity, and diversity of the forests of the CHMU.

Public Comment Theme: The increase in logging is a radical departure from the past 30 years and is not consistent with the overall objectives of the park. The plan represents a downgrade in the protected status of Camel's Hump and sets a dangerous precedent.

Response to comments: The timber harvesting schedule is consistent with the overall objectives of the park, including [10 V.S.A. §2353](#) that defines the uses of each "district." While the timber harvesting schedule represents an increase from that which was harvested in the last 30 years, it is less than that which was *approved* for harvest in the last iteration of the plan. The 1991 plan proposed harvesting on a total of 4,740 acres out of what was then a smaller unit- 19,636 acres. Many of the proposed harvests in the current plan were originally proposed in the 1991 plan and not implemented because the harvest areas were not yet ready for harvest or due to lack of staffing capacity.

Public Comment Theme: Joseph Battell, who gifted the summit of Camel's Hump and the surrounding forests to the State of Vermont in 1910, requested that the lands be "preserved in a primeval state."

Response to comments: Battell's Gift consists of approximately 1,147 acres. The deed states: "Trees growing on the land herein conveyed are not to be cut except those which it is necessary to remove in building paths or roads, and the whole forest is to be preserved in a primeval state by planting or natural growth." There are no timber harvests planned for this land, nor will there ever be. The conditions of Battell's gift do not extend beyond the parcels which he gave to the state.

Public Comment Theme: The draft plan treats Camel’s Hump like a commodity. Timber harvesting has nothing to do with “helping” the forest. It is greedy, aggressive, and serves the interests of a few over those of the many. Logging should not be allowed.

Response to comments: ANR will continue to manage forests within the CHMU for multiple uses in accordance with legislation that establishes the purpose of the park ([10 V.S.A § 2353](#)), as well as the mission of the [Department of Forests, Parks & Recreation](#). Sustainable forest management creates important wildlife habitat, enhances the resilience of forest ecosystems, helps create and maintain recreational access, and supports local jobs while remaining compatible with other management goals.

Human Health and Safety Concerns

Public Comment Theme: Cutting trees will increase the prevalence of Lyme Disease.

Response to comments: Lyme disease and tick populations have expanded in recent years. The causes of this include a changing climate, growing deer populations, loss of farmland, and changing land use patterns. It is possible that timber harvesting that leads to thick understory vegetation could lead to increased tick prevalence, but this impact would be difficult to disentangle from the other causes of increased tick populations. All visitors to the CHMU are encouraged to take precautions to reduce their exposure to ticks.

Public Comment Theme: Timber management at the end of Mountainview Road in Duxbury is unsafe and inappropriate. This area is designated as a suburb by the federal government. Its roads are too steep and crowded to safely accommodate the proposed amount of logging and truck traffic.

Response to comments: The US Census Bureau designates *Urban Areas*, *Urban Clusters*, and *Rural Areas*. The town of Duxbury is defined as “rural” by the US Census Bureau. The town of Duxbury Zoning Map places Mountainview Road within the “Forest Recreation” and “Timber Management and Wildlife” Districts.

While Mountainview Road is steep and narrow, it can be safely navigated by appropriately sized log trucks. FPR regularly imposes restrictions in timber sale contracts that limit the hours of trucking to reduce conflicts with school bus traffic.

Unintended Impacts

Public Comment theme: Timber harvesting will have negative impacts on recreation by closing trails and causing understory plant growth in areas that are popular for skiing.

Response to comments: Recreation and forest management are compatible uses and have been so on the CHMU for decades. Trails and roads are not closed during harvesting operations.

However, signs are posted warning visitors that an operation is occurring, and users are asked to exercise caution when traversing harvest areas. Logging contractors are notified that roads and trails are frequented by visitors. There are no timber sales scheduled in the vicinity of the Long Trail or side trails to the Long Trail. There are several places where snowmobile trails and cross-country ski trails will be utilized for transporting wood, which means the trail or road will be plowed. The DST works with skiers and snowmobilers to find alternate routes, or users continue to travel the road with caution. FPR will also apply weekend restrictions on trucking on popular trails. For instance, the most recent harvest completed in the CHMU had a condition that prohibited trucking wood on weekends to allow skiers to use the road.

Open woodlands that are free of undergrowth may be aesthetically pleasing and easier for skiers to maintain. However, this forest condition is less desirable ecologically. The very purpose of certain kinds of timber management is to regenerate a dense understory of seedlings and saplings that will develop into mature trees, thus diversifying forest structure and enhancing wildlife habitat, especially for forest songbird breeding.

Public Comment Theme: Timber harvesting will have a negative impact on the view from Camel's Hump Summit, and from nearby homes and roads.

Response to comments: The plan allows the creation of forest openings up to 15 acres. In the last 28 years, the largest opening created on the CHMU was approximately 6 acres and to most an opening of that size would be difficult to locate on an aerial map. Most of the timber harvesting will utilize single tree and group selection and these areas are unlikely to be noticed from the summit, private residences, or roads.

Public Comment Theme: Timber harvesting could have negative impacts on neighboring properties.

Response to comments: ANR does not have a specific policy for buffering inholdings or adjacent properties during layout of timber harvests on state lands. However, foresters communicate with neighbors prior to harvests, are keenly aware of the proximity of neighboring structures and property boundaries, and balance safety with silvicultural objectives when marking trees and laying out skid roads near property boundaries.

Accountability

Public Comment Theme: ANR should only contract with *local* logging companies certified to carry out ecologically sensitive harvesting operations adhering to the standards of the Forest Stewardship Council or any other credible, independent forest certification entity.

Response to comments: ANR is obligated to contract for services adhering to guidelines set forth in State of Vermont [Administrative Bulletin 3.5- Procurement and Contracting Procedures](#).

Reasonable restrictions may be placed on logging contractors, but these must be defensible, and typically consist of specifying equipment types that are suitable on a given site. A requirement that loggers be certified by a third party in order to operate on the CHMU would require a change to state-wide practice that applies to all ANR lands and would not be considered in association with the LRMP process. Timber sale contracts for logging on ANR lands include strict standards and conditions, and operations are monitored closely by FPR State of Vermont licensed foresters.

Public Comment theme: Loggers should be held to as high a standard as trail construction projects. ANR should inspect all logging operations post-harvest to ensure adherence to best management practices. Loggers should not be allowed to use “legacy skid roads.” These roads should be discontinued and re-designed.

Response to comments: Logging operations are held to strict standards. FPR State of Vermont licensed foresters make frequent visits to active harvests and work with operators to implement the appropriate measures to protect water and site quality and inspect harvests to make sure that operators are abiding by the marking and contractual guidelines.

Legacy skid roads are present throughout the CHMU. Many are well constructed and useful. On any given harvest, the forester evaluates which existing roads should be used and which should be avoided and repaired or decommissioned. All active skid roads are maintained throughout the harvest with appropriate drainage structures and “closed-out” at the end of the harvest through the installation of appropriate water diversion structures. When a legacy skid road is found on a timber sale but is not used, foresters are opportunistic in decommissioning these. The plan has been edited to reflect the importance of pro-actively decommissioning legacy skid roads (Section IV.B.)

Public Comment Theme: ANR should provide citizens with the opportunity to participate in monitoring Acceptable Management Practices (AMP) compliance and ecosystem health including water quality. To increase credibility, ANR should not monitor itself.

Response to comment: The way in which ANR monitors AMP compliance on timber harvests on state land is beyond the scope of the LRMP. However, if any individuals suspect an AMP violation, they should contact FPR to investigate.

Public Comment Theme: How do staff identify sensitive ecological features and critical wildlife habitats within harvest areas for special treatment? How are silvicultural prescriptions created for treatment areas?

Response to comments: The timber management schedule in the plan provides a guide for the timing and type of management that will occur in each treatment area and are subject to change. Detailed prescriptions are written after a State of Vermont licensed forester conducts a thorough forest inventory, and biologists and ecologists identify special habitat features through field visits to the harvest area. The silvicultural prescription is then written and reviewed by members of the District Stewardship Team and headquarters staff.

Public Comment Theme: The plan includes a variety of designations, both formal and informal related to the Land Management Classification, Legislative Districts, and whether land can be managed for timber. It is not obvious which acreage is eligible for timber management.

Response to comments: The plan has been edited to reflect that a total of 7,483 acres are available for timber management. This includes areas that are classified both as *General Management Areas* and *Special Management Areas* in ANR's Land Management Classification system (LMC), and lands that correspond to the *Multiple Use Area* and *Timber Management and Wildlife Area* as defined by the legislature in [10 V.S.A. §2353](#). ANR recognizes that these overlapping designations can be confusing. Map 11 clearly depicts those areas that are and are not available for timber management.

The area that is eligible for timber management includes those areas that are not otherwise restricted from this use by deed, easement, or legislation, or characteristics of the land itself such as slope, soil type, and distance from existing infrastructure. Table 5 lists acreage figures for areas based on whether they are available for timber management, or for what reason they are not available. Map 11 indicates which areas are eligible for timber management, while maps 20 and 21 depict those areas scheduled for management in the next 15 years.

Public Comment Theme: I am concerned that many of the planned timber harvests will not get done in a timely fashion without ANR dedicating more personnel to the state lands timber cutting effort.

Response to comments: ANR believes that the timber harvest schedule is an achievable one given current staffing levels.

Wildlife and Habitat Management

Unique Habitat Features and Forest Conditions

Public Comment Theme: The plan does not identify existing areas of old growth forest, nor does it set aside any lands for the restoration of old-growth conditions. The plan should set aside 30% of the timberland for old-growth restoration.

Response to comments: Approximately 65% of the total CHMU area is not available for timber management. The area of the CHMU where timber harvesting could occur is approximately 7,483 acres (with a total of 3,749 acres scheduled for management in the next 15 years). A third party owns the timber rights on approximately 1,473 acres of Huntington Gap WMA and ANR has limited input on the management of this area. Still other areas are not forested. However, the vast majority of the CHMU is not available for timber harvesting, either due to ground conditions, legal restrictions (deed restrictions, easements), or born of the legislative use districts. This includes 91% of spruce-fir-Northern Hardwood forest types and 50% of northern hardwood forest types, including those at lower and mid-elevations.

The area that is not available to timber harvesting does not just include land that is inoperable, inaccessible, and non-merchantable. It also includes good growing sites at lower elevations, including portions of the Gleason Brook watershed, and the Ecological Protection Zone in Phen Basin. Map 11 depicts those areas that are and are not available for timber management, while Table 5 lists acreage figures for areas based on whether they are available for timber management, or for what reason they are not available.

In the area that is not available for timber harvesting, natural disturbance regimes will be the dominant force in forest development and these areas are expected to develop the more complex structural characteristic of old forests. The area that is not available to timber harvesting is consistent with the regional old forest targets established by [Vermont Conservation Design](#).

Public Comment Theme: The Special Wildlife Habitat map (map 10) fails to identify major corridors used by moose and bear and critical habitats such as bobcat denning sites on the Bolton cliffs. Furthermore, the map indicates a bias toward game animals. There are no designations on the map, for instance, of the “special” habitat for Bicknell’s Thrush.

Response to comments: Because of its size and unfragmented character, the main portion of the CHMU acts as a north-south wildlife corridor sandwiched between the more developed Huntington River and Mad River Valleys. Within the CHMU, ridgelines and riparian areas would be the predominant corridors, but would be difficult and confusing to map at a finer scale in map 10. The finer scale features that enhance the value of a certain area for wildlife movement are identified through field observation during timber inventory or during other assessments related to new trail development.

The *Selected Wildlife Habitat* map is meant to depict certain habitat features, not all habitat features of interest to all readers. The map does include old field, young forest, aspen/white birch, bear feeding areas, deer wintering areas, soft mast production areas, wetlands, alder swamps, forest openings, agricultural lands, and red oak stands. Some of these features are related to game animals, others are not, yet all are important for a variety of wildlife that use these habitats and food sources. Certain habitat features are omitted to protect the habitat

itself. For instance, there are two *confirmed* bobcat dens on the CHMU, but the location of the dens will remain undisclosed for protection of this wildlife species.

The *Selected Wildlife Habitat* map focuses on discrete habitats that may not be discerned at the scale of the natural community maps (maps 6-9). For some species, Natural Community mapping is a suitable framework to guide management decisions. For example, Bicknell's Thrush may nest throughout the Montane Spruce-Fir Forest natural community, an area greater than 4000 acres.

Public Comment Theme: What is ANR doing to improve connectivity between Camel's Hump State Park and other protected areas in Vermont? How does ANR plan to improve safe passage for animals crossing the Winooski River/Rt. 2/I-89 corridor?

Response to comments: ANR attaches great value to parcels that enhance connectivity between forest blocks and across elevation gradients and considers this when targeting new acquisitions or reviewing land donations.

Outside of acquisition priorities, improving the safe passage of wildlife across the Winooski River Valley is beyond the scope of this plan. However, ANR is actively engaged in improving wildlife connectivity in this area and surrounding lands. Within road rights-of-way, ANR works closely with the Vermont Agency of Transportation to enhance existing highway underpasses and plan for more functional replacements in coordination with long-term transportation plans. Two nearby riparian corridors- Pineo Brook and Sharkeyville Brook- are critical for wildlife connectivity between Camel's Hump State Park and conserved lands to the north.

Outside of road rights-of-way, ANR is engaged with a host of partners through the [Staying Connected Initiative](#). This group supports landscape connectivity through identification of key wildlife road crossings, targeted land conservation, outreach to towns to encourage compatible zoning regulations, and educating landowners on appropriate land management strategies.

Suggestions for Improving Wildlife Habitat and Ensuring Best Practices

Public Comment Theme: The plan should minimize timber harvesting between May and mid-July as this will minimize disturbance during the bird breeding season.

Response to comments: It is uncommon that harvesting would occur between May and Mid-July. Most harvesting occurs during winter on frozen or snow-covered ground. Summer harvesting occurs on dry sites and in cases where soil scarification is desired to regenerate specific tree species that respond favorably to such ground disturbance. Summer harvesting has grown more common on state land with the shortened winter harvesting season. There will be occasions when the DST will need to balance the considerations related to soil scarification,

taking advantage of dry summers, and bird breeding. Still, harvesting before mid-July will be uncommon.

Public Comment Theme: The plan should specify that old fields should not be mowed until after Sept 15 to allow pollinator habitat to exist longer and allow post-breeding birds to utilize seed and fruit sources prior to migration.

Response to comments: The plan has been edited to reflect that Old Fields/Maintained Openings (LMC 2.2C) should be mowed on a 2-5 year cycle, not a 1-5 year cycle (see section IV.B). The earliest mowing date of August 15 will remain in effect, but impacts should be minimal given that fields are not mowed every year and most mowing will occur later in the fall due to schedule and availability of mowing contractors.

Public Comment Theme: While the plan offers detail on standing snags, there is no metric for coarse woody material on the forest floor, which has been demonstrated as having significant value to wildlife, soils, and carbon sequestration (and as such should be addressed). We recommend using the metrics found in FPR's Voluntary Harvesting Guidelines (i.e. leave 3-5 stems at least 18" in diameter and 10 stems at least 14" in diameter per acre, all at least 16' long).

Response to comments: The plan has been edited to reflect the target for downed woody material that is described in the [Voluntary Harvesting Guidelines for Landowners in Vermont](#) (see section IV.B).

Miscellaneous Comments Relating to Wildlife and Habitat Management

Public Comment Theme: The CHMU is one of the most important forest blocks in the Atlantic flyway and provides habitat to many priority species. The draft plan is consistent overall with maintaining and/or enhancing high-quality breeding habitat for a diverse suite of bird species. To better reflect these species, we recommend that the list of critical bird species should be changed to use the birds on the State Wildlife Action Plan list of Species of Greatest Conservation Need. Likewise, the write-up on birds on page 34 should instead focus on Canada Warbler, Peregrine Falcon, Bicknell's Thrush, Black-throated Blue Warbler and Chestnut-sided Warbler as these species are mostly likely to breed in the habitats covered by the plan.

Response to comments: Table 3 has been edited to include all rare and uncommon animal species that are also listed in the [State Wildlife Action Plan](#) as *Species of Greatest Conservation Need*.

Public Comment Theme: The wildlife and cultural sections are short on actionable objectives and timelines for completion.

Response to comments: Many of the Wildlife Habitat Management Strategies identified in section IV.B will be achieved by managing stands through timber harvests. These harvests do have an implementation schedule.

Section IV.B also identifies strategies concerning the protection of historic resources and public outreach and education. These strategies tend to get implemented in concert with other management activities or are the result of *preventing* certain actions. It is difficult to attach a timeline to strategies of this nature.

Public Comment Theme: With these two priorities in mind—recreation and wildlife habitat, we respectfully submit that the ANR should suspend trapping and hunting of rodent predator species, such as fox, coyote, weasel, mink, bobcat, fisher, etc. and of beaver on the two Wildlife Management Areas (WMAs)—Huntington Gap and Robbins Mountain—where trapping is currently allowed.

Public Comment Theme: The Recreational Assessment makes no mention of hunting, trapping, or fishing. The plan should affirmatively recognize these as allowed uses.

Response to comments: Trapping and hunting are allowed uses on the CHMU, including all Camel’s Hump State Park, Camel’s Hump State Forest, Robbins Mountain Wildlife Management Area, and Huntington Gap Wildlife Management Area, as long as state laws that pertain to these activities are followed. ANR does not typically suspend hunting or trapping of specific species in association with the implementation of an LRMP. The Recreation Assessment has been edited to reflect that hunting, fishing, and trapping are allowed on the property.

Public Comment Theme: The plan does not identify how the volunteer conservation efforts in the Stevens Block of Camel’s Hump SF are handled. It feels as if this volunteer group is closed to other members. It is not appropriate that some members of the public may cut firewood cheaply and others cannot.

Response to comments: Volunteer work on the Stevens Block of Camel’s Hump SF is coordinated by a District Forester and directed by an annual work plan to accomplish desired outcomes. These outcomes are described in Section IV.C, LMC 2.4H. The Orvis Volunteer Group is not closed and has welcomed new members in the past. Only a very small part of their work involves cutting firewood and volunteers must be willing to engage in the other aspects of this habitat work (releasing softwood trees, brush-hogging fields, pruning trees, etc.) Little firewood is removed each year, especially in relation to the cost and effort involved with the other habitat work on the parcel. If members of the public are interested in assisting with this or other habitat management work, they should contact a [district office](#).

Natural and Cultural Resource Protection

Suggestions for Improving Cultural Resource Protection

Public Comment Theme: Three reports dated 2003, 2007, and 2009 deal with cultural and archaeological resources within the park. Each recommends that ANR send out survey teams to identify, map, and protect Native American and early European settler sites. The draft plan contains no action plans or time table to deliver on these recommendations.

Response to comment: Documenting, interpreting, and protecting historic resources is identified as a strategy in the existing plan (Section IV.B). This work is done on an as needed basis in accordance with state and federal requirements to protect historic resources. Projects that involve subsurface disturbance are reviewed by the Division of Historic Preservation (DHP).

Public Comment Theme: ANR should install informational signage about historical resources along trails and roads and incorporate environmental education and ecology into programming to encourage more people to learn the inherent value of CHMU.

Response to comments: The plan has been edited to include the importance of interpretive signage documenting historic resources (Section IV.B).

Suggestions for Improving Natural Resource Protection

Public Comment Theme: The plan should include restoration activities with workable time-bound strategies to restore critical habitats for imperiled flora and fauna within CHSP. The plan should also include strategies for the control and eradication of invasive plant species.

Response to comments: Because the CHMU comprises such a large area of intact forest habitat, there are few areas in need of restoration. There are several rare, threatened, and endangered plant species that are monitored by ANR staff and volunteers from the Native Plant Trust.

The summit area is one such location. Years ago, the north summit was becoming degraded from visitors trampling alpine plants. This area was closed to the public and monitoring has shown a marked improvement in the condition of the alpine plant community. The north summit and main summit are visited periodically, and the condition of rare plants are recorded. GMC summit caretakers continue to educate visitors about how to lower their impact in the alpine zone, and encourage visitors to keep off the north summit.

The most important restoration that occurs on the CHMU involves the treatment of emerging invasive plant populations. Staff conduct annual surveys of roads, landings, and other known areas of invasive plant infestations. Infestations are evaluated in accordance with the State

Policy on Use of Pesticides on State Lands. Most infestations within the CHMU are addressed through mechanical or chemical treatment in accordance with a *Pesticide Use Impact Assessment for Invasive Plant Control on State Lands.*

Public Comment Theme: ANR should designate more low and mid-elevation areas with the highest level of protection as part of the current planning process. Designating these areas will safeguard critical wildlife habitats, protect remote, backcountry experiences for recreation and hunting, and maintain the near-wild character that many visitors cherish about Camel’s Hump.

Response to comments: Overall, the most heavily managed areas of the CHMU are at lower elevations. However, there are low and mid-elevation areas that are not available for commercial timber and wildlife management and host to a lower density of trails because of legislative mandates and conservation easements. There are approximately 1,300 acres of the Ecological Area (LMC 1.8H) that extend below 2,500 feet in the Gleason Brook drainage. An additional 1,800 acres of the Phen Basin Ecological Protection Zone (LMC 1.10I) also extends below 2,500 feet in elevation. Uphill of these areas are extensive portions of the Ecological Area, and other lands which are not managed for timber and difficult to access by visitors. These comprise some of the most remote portions of the CHMU.

Public Comment theme: Future land acquisitions should prioritize creating more elevational linkages that provides connectivity from the river valley up to the ridgeline.

Response to comments: ANR will continue to identify priority parcels for conservation near and adjacent to the CHMU. Properties that provide elevational linkage and those that include known wildlife corridors, and high-quality streams are a priority for ANR and will become increasingly critical in the face of climate change impacts and shifting ranges.

Public Comment Theme: The public has overwhelmingly pointed to the high value of this management unit for non-damaging recreation and habitat conservation and that should be the overarching management goal. While it is true that this forest can produce very high-quality timber products, among other potential extractive uses, that does not mean such uses should be “balanced” in equal proportion.

Response to comments: The LRMP seeks to manage public lands for multiple uses that are reflective of public interest and responsibly protect natural resources within the land base. Some management objectives result in multiple benefits. For instance, improvements to a woods road may facilitate access to a future timber harvest, enhance the road for recreational use, enable aquatic organism passage through larger culverts, and make the road more resilient to future storms. Timber management can be an important part of habitat management, conservation, restoration, and maintaining forest health. ANR’s land management approach recognizes the complementary uses and goals of the property and state land in general.

Public Comment Theme: The natural resource mapping fails to identify certain water features that seem exceptional. The plan only classifies 213 acres as LMC 1.7 *Exceptional Water Features*. What about all the small headwater streams?

Response to comments: The areas identified as *LMC 1.7 Exceptional Water Features* are discrete features and easily mapped. The LRMP does not treat these areas as the *only* important water resources. The many small rivers and streams within the unit are not easily mapped because they are not part of existing spatial data sets. Instead, they are identified on field visits. These are embedded in other LMC categories and will be managed accordingly. These features are protected from impacts of vegetation management and recreational use by the proper implementation of *Acceptable Management Practices for Maintaining Water Quality on Logging Jobs in Vermont*, trail and bridge construction standards, and adherence to the ANR's *Riparian Management Guidelines*.

Public Comment Theme: ANR should maximize the value of the Ecological Protection Zone in Phen Basin by (1) creating a consortium for conducting research and (2) establish it as a natural heritage site.

Response to comments: ANR does not intend to create a new consortium focused on research in the Ecological Protection Zone. The [Forest Ecosystem Monitoring Cooperative](#) (FEMC) is an already existing partnership of Northeastern state agencies, The University of Vermont, and the USDA Forest Service, and promotes the coordination of multi-disciplinary environmental monitoring and research activities in forest ecosystems in the Northeast. Research is an allowed activity on state land with the appropriate license or special use permit and ANR is supportive of interested parties conducting research in this area.

Public Comment Theme: The plan should include a “threats analysis” section that discusses how climate change, atmospheric pollution, logging, and non-native flora and fauna will impact forest health. The plan should propose management strategies and contingency plans to address and ameliorate identified threats.

Response to comments: A “threats analysis” is not presently part of the LRMP format. However, table 10 and 11 detail potential changes to the climate of New England and New York, and potential impacts to the forest because of climate change. Management strategies to address these factors can be found throughout section IV.B.

Plan Format, Existing or Inadequate Assessments, and Public Involvement Process

Public Comment Theme: Section III.K states that aesthetics will be taken into consideration when making future management decisions. This statement needs elaboration. How, exactly, will aesthetics be considered? Will the USFS Scenery Management system be employed? Some other approach?

Response to comments: ANR does not have a comprehensive way of considering aesthetics in management decisions. However, the visual impact is a consideration when developing silvicultural prescriptions, laying out trails, and during other activities that require vegetation management.

Public Comment Theme: The plan should include a section disclosing the annual budget for CHSP as well as a discussion section revealing how the budget is allocated toward the four management goals. The plan should also include an economic analysis of the real economic value of Camel's Hump state Park, in reference to its environmental services (nutrient cycling, climate regulation, watershed protection, genetic resources, recreation opportunities, and aesthetics).

Response to comments: There is no "annual budget" for Camel's Hump State Park. The DST and other ANR staff spends time managing this and many other properties but do not track their time to a specific property or management goal. Funding for specific projects on ANR lands are proposed and funding is allocated based on an evaluation of their priority and available resources.

An economic analysis of the value of the ecosystem services afforded by the CHMU would be an informative exercise. ANR does not currently include an economic valuation analysis as part of the planning process.

Public Comment theme: There was an insufficient amount of time to provide public comment. The public involvement process reflects a very outdated model of public engagement and consultation.

Response to comments: The DST conducted four widely advertised public meetings in November and December of 2017. Meeting notices were sent to town officials, conservation organizations, and individuals known to ANR as having an interest in the management unit. Notices also appeared in local newspapers and several stories appeared in local press during the open comment period. The initial comment period ran for approximately eleven weeks. A second comment period ran for an additional five weeks. The DST received over 700 comments by email and letter.

The public involvement process was consistent with Agency guidelines and norms for the creation of Long-Range Management Plans.

Public Comment Theme: Further public input needs to be taken when significant changes are made to public lands, which these proposed trail systems certainly constitute. It was indicated at the public meetings that there would be no such public input process for any new cross country or mountain bike trails in the unbounded, vaguely designated areas.

Response to comments: The public meetings and comment period constitute the extent of formal public involvement for activities - such as new trails - that are proposed in the plan. While certain trail proposals are still in the planning phase and a specific route has not yet been identified, the DST will work with local corridor managers to finalize the exact route according to ANR guidelines for reviewing trail proposals. New trail proposals that are not included in the LRMP would trigger an amendment to the LRMP and a level of public involvement commensurate with the proposed change.

Public Comment theme: Expand the planning team, assessment, and conservation plan to provide a more holistic and comprehensive assessment of forest conditions.

Comment theme: Camel's Hump would best be protected under a new state wilderness designation and managed under a separate Camels Hump Park Authority

Response to comments: The DST is an inter-disciplinary group of natural resource professionals from the Departments of Forests, Parks & Recreation, Fish and Wildlife, and Environmental Conservation. The DST includes wildlife and fisheries biologists, foresters, recreation managers, the state land ecologist, and a watershed planner. When necessary, this group seeks input from other ANR professionals. The DST has broad expertise and considers a wide array of factors when writing and implementing Long-Range Management Plans. The DST model is consistent across districts/regions and is responsible for the management of all ANR lands. A portion of the property is already designated a State Natural Area which exists, in part, to protect the "wilderness character" of the property.

Public Comment theme: Section IV.C. Land Classification Management is difficult to follow; structural and formatting revision are recommended.

Response to comments: The structure of Section IV is in conformance with the current, existing LRMP format for all state land parcels.

Public Comment Theme: The plan should have a compelling *Vision Statement*. The Executive Summary should contain more detail about the actual management activities prescribed in the plan.

Response to comments: A “Vision Statement” is not presently a part of the standard template for Long-Range Management Plans. However, the Executive Summary has been edited to reflect some of the management decisions described in the plan.

Public Comment Theme: If sugaring is going to be an allowed use on a portion of the CHMU, or may become one, the plan should provide some discussion of standards by which operations should be managed.

Response to comment: Act No.21 of the 2009 Vermont State Legislative session (S.94 - An Act Relating to Licensing State Forest Land for Maple Sugar Production) established as state policy the limited use of state lands under the jurisdiction of the Department of Forests, Parks and Recreation for maple sugar production. The legislation directs the Department to work with the Vermont Maple Sugar Makers Association to develop responsible tapping guidelines and to issue licenses for tapping maple trees at appropriate sites on state forest and park land in accordance with the standards and guidelines. Currently, there is one license for maple sugaring in CHMU.

Public Comment Theme: The plan is inconsistent in its reference to the use districts and areas as defined by the enabling legislation.

Response to comments: The plan has been edited with an eye towards consistency and honoring the wording of the legislation. Each “Use District” is now referenced correctly as either the “Ecological Area,” “Timber Management and Wildlife Area,” or “Multiple-use Area.”

Public Comment Theme: The table of invasive plants needs careful editing.

Response to comments: Table 9 has been edited.

Public Comment Theme: The plan should provide more detail about how the big picture goals, such as enhancing wildlife habitat, climate adaptation, and timber production, will translate down to silvicultural prescriptions and how conflicts between objectives will be resolved at the stand scale. To this end, we recommend using Silviculture with Birds in Mind management since these practices also help create a more climate resilient forest.

Response to comments: The way in which broad goals are incorporated into stand-level prescriptions is based on detailed inventories of the stand and the surrounding landscape context. Silvicultural prescriptions are written by an FPR State of Vermont licensed forester with input from wildlife biologists, the state lands ecologist, and are subject to review by the entire DST. Silviculture with Birds in Mind is a creation of FPR and Audubon Vermont and it is among the silvicultural guides that will be used when implementing forest management practices.

Public Comment Theme: We support the approach to combine the management plans of the state park, state forest, and wildlife management area into one comprehensive management unit. However, the scale, diversity, and quality of the natural resources in the Camel’s Hump area demand a more robust landscape scale perspective than is reflected in the current draft plan.

Response to comments: Long-Range Management Plans are written for specific ANR properties, not for the landscape scale or biophysical regions. The CHMU LRMP incorporates guidelines and targets from larger scale plans such as regional conservation plans or the work of [Vermont Conservation Design](#).

Public Comment Theme: The table of *Expected Climate Change Effects* incorporates some intriguing thinking and wording as it relates to the likeliness of certain impacts or the timeframe of those impacts.

Response to comments: Section 3.G has been edited to better convey the already observed and projected changes to climate in the northeast, and the potential impacts on forests resulting from these changes.